

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

BARBARA H. LEE, et al.,

Plaintiffs,

V.

VIRGINIA STATE BOARD OF ELECTIONS,
et al.,

Defendants.

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) Civil Action No: 3:15 CV 357
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NON-PARTY REGISTRARS' MOTION TO QUASH SUBPOENAS

Pursuant to Fed. R. Civ. P. 26(b)(2) and 45(d)(3)(A), Non-Party Registrars¹, by and through the undersigned counsel, hereby move this Court to quash the subpoenas issued by the Plaintiffs.

For the reasons outlined in the attached Memorandum in Support, discovery from the Non-Party Registrars this Court should quash the subpoenas because compliance would be unduly burdensome and because the subpoenas seek information that could be more easily obtained from the Defendants.

¹ This Motion is on behalf of the following Non-Party Registrars: Ms. Francine Brown (Amherst County), Ms. Connie Messick (Augusta County), Mr. David Clary (Brunswick County), Ms. Peggy Petty (City of Danville), Mr. David Bjerke (City of Falls Church), Mr. Alex Ables (Fauquier County), Ms. Amy Ingram (Floyd County), Ms. Bobbi Morgan (Gloucester County); Ms. Frances Ragland (Goochland County), Mr. Alan Cole (James City County), Ms. Judith Brown (Loudoun County), Ms. Vicki Lewis (City of Newport News), Ms. Judy Stokes (Roanoke County), Mr. Greg Riddlemoser (Stafford County), Ms. Susan Saunders (City of Suffolk), Ms. Carol Tobin (Warren County), Ms. Elizabeth Martin (City of Winchester).

Respectfully submitted: November 24, 2015

/s/_____

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RULE 26(c)(1) CERTIFICATION

Pursuant to Rule 26(c)(1) of the Federal Rules of Civil Procedure and Local Civil Rule 7, counsel for Movants certify that they have conferred in good faith with counsel for Plaintiffs via telephone to explore the possibility of narrowing or resolving this issue without court action. Those efforts were unsuccessful.

CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent a notification to all counsel of record.

Respectfully submitted,

By: /S/

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